

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

William Reynolds, individually; as spouse of Sylwia Pawlak Reynolds; and as next friend of their minor children, AMR, WR, and AR,

Court File No. 25-cv-754-LMP-JFD

Plaintiff,

v.

Nancy Sanders Harper, M.D. et al.,

**STIPULATION TO EXTEND
TIME TO RESPOND TO
PLAINTIFF'S AMENDED
COMPLAINT**

Defendants.

Plaintiff William Reynolds, Defendants Sarah Elizabeth Lucken, M.D., Seth Cheng Silbert, M.D., Mohamed Tabsin A. Jouhari, M.D., and Hennepin Healthcare System, Inc. (“HHS Defendants”), Defendants Hennepin County and Britta Nicholson (“County Defendants”), and Defendant The Board of Regents of the University of Minnesota (“University of Minnesota”), by and through their respective counsel, hereby stipulate and agree to the following:

1. WHEREAS, Plaintiff filed this action on February 27, 2025;
2. WHEREAS, Plaintiff filed an Amended Complaint on March 31, 2025;
3. WHEREAS, the Court may extend the time to answer or otherwise respond to the Complaint for good cause, *see* Fed. R. Civ. P. 6(b);
4. WHEREAS, counsel for Plaintiff and respective counsel for Defendants met and conferred on issues related to waiver of service of the Amended Complaint and the

time for Defendants herein to respond to Plaintiff's Amended Complaint, and the parties have agreed to cooperate on these issues;

5. WHEREAS, Defendant University of Minnesota executed a waiver of service on April 29, 2025 (ECF No. 11);

6. WHEREAS, the HHS Defendants executed waivers of service on May 29, 2025 (ECF Nos. 15-18);

7. WHEREAS, the County Defendants executed waivers of service on May 29, 2025 (ECF Nos. 13-14); and

8. WHEREAS, counsel for Plaintiff, HHS Defendants, County Defendants, and Defendant University of Minnesota agree that the deadline for HHS Defendants, County Defendants, and Defendant University of Minnesota to answer or otherwise respond to Plaintiff's Amended Complaint may be extended until August 1, 2025.

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the parties to this Stipulation that the Court may enter an Order that states that the HHS Defendants, County Defendants, and Defendant University of Minnesota shall answer or otherwise respond to Plaintiff's Amended Complaint on or before August 1, 2025.

STIPULATED TO BY:

Dated: May 30, 2025

Law Offices of J.M. Reinan, PC

/s/Jerome M. Reinan

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For the HHS Defendants:

Dated: May 30, 2025

By: s/Marissa K. Linden

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Attorneys for the HHS Defendants

For the County Defendants:

Dated: May 30, 2025

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For Defendant University of Minnesota:

Dated: May 30, 2025

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